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October 6, 2016

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

**Re: Applications of AT&T Inc. and DIRECTV for Consent To Assign or Transfer
Control of Licenses and Authorizations, MB Docket No. 14-90**

Dear Ms. Dortch:

Based on discussions among AT&T, the Commission staff, and the Independent Compliance Officer, AT&T hereby describes the process it will use to report, pursuant to Section III.A.3 of the AT&T/DIRECTV Merger Conditions, (1) Customer Locations to which FTTP has been deployed within certain multiple dwelling units (“MDUs”) and (2) Customer Locations to which AT&T has completed FTTP deployment, but for which latitude and longitude coordinates are not available.

I. Multiple Dwelling Units

AT&T and the Commission staff have agreed that AT&T may count towards the FTTP buildout requirements the Customer Locations within MDUs that require the MDU owner¹ and AT&T to agree to a right of access to deploy fiber within the MDU² when (a) AT&T has

¹ “MDU owner” herein refers to the property owner or manager who has the authority to grant AT&T a right of access to an MDU and agree to an inside wiring plan.

² There are a significant number of MDUs (e.g., duplexes or flats) that do not require AT&T to negotiate or otherwise obtain rights of access from the MDU owner in order to deploy FTTP. In such circumstances, the process generally is similar to deployment to single-family homes. The methodology described herein will not apply to such MDUs where entry by agreement is not required.

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deployed fiber within that MDU to the full extent of the rights obtained by AT&T from the MDU owner; or (b) AT&T has extended fiber to accessible terminals or other facilities in the right of way outside that MDU where the MDU owner does not grant access or the parties cannot agree on a plan for extending fiber within the MDU. In each case, for the Customer Locations to be counted, the FTTP deployment or fiber allocation must conform to the following parameters:

1. On or after October 31, 2016, when marketing fiber deployments to owners of MDUs that require the MDU owner and AT&T to agree to a right of access in order to deploy fiber within the MDU, AT&T will:
 - a. Make fiber deployments to individual units the lead and primary proposal when making initial contact with MDU owners.
 - b. Train sales representatives to promote fiber deployment to individual units in negotiations with MDU owners. The trainings may include, among other things:
 - i. information regarding AT&T's fiber deployment strategy;
 - ii. messaging materials regarding the value for MDU property owners, property staff, and residents, of fiber to individual units;
 - iii. scripts to gain commitments from MDU owners;
 - iv. steps to overcome objections;
 - v. responses to frequently asked questions;
 - vi. how to access and use marketing materials, including printed collateral, digital media, and property launch kits.
 - c. Notify in writing an MDU owner of the opportunity to have AT&T deploy fiber to reach individual units within the MDU.
 - d. Offer to design, at AT&T's expense, an inside wiring plan for the MDU to deliver fiber to reach individual units within the MDU.
 - e. Present written materials to MDU owners regarding the benefits of fiber deployment to individual units.
2. AT&T will submit examples of the training materials, MDU design offers and collateral materials described in section one, above, to the Independent Compliance Officer.
3. If AT&T reaches an agreement with an MDU owner to deploy fiber within the MDU, AT&T may count any Customer Location within the MDU towards the FTTP buildout requirements once AT&T deploys fiber to serve that Customer Location to the full extent of the rights obtained by AT&T from the MDU owner. For example, if AT&T obtains the right to deploy fiber to the Customer Locations within an MDU, and AT&T and the MDU owner agree that AT&T will deploy fiber all the way to each Customer Location, but AT&T only deploys fiber to a telecom closet within the

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MDU, then AT&T would not count those Customer Locations served from that telecom closet towards the FTTP buildout requirements.

4. If the MDU owner rejects AT&T's request for access to deploy fiber within the MDU or the parties cannot agree on a plan for extending fiber within the MDU, AT&T will send a certified letter to the owner of the MDU confirming that the MDU owner has not granted AT&T access to deploy fiber within the MDU. After AT&T sends the certified letter, AT&T may count such Customer Locations towards the FTTP buildout requirements provided that AT&T satisfies the additional requirements in this section four and section five, below. During the term of the Condition, AT&T will contact the MDU owner at least annually from the date of the certified letter to renew AT&T's request to deploy fiber within the MDU.
5. If AT&T has counted towards the FTTP buildout requirements on a prior semi-annual compliance report an MDU Customer Location pursuant to section four, above, and, during the term of the Condition, AT&T subsequently reaches an agreement with the MDU owner to deploy fiber within the MDU, AT&T must deploy fiber within that MDU to the full extent of the rights obtained by AT&T from the MDU owner. If AT&T has not completed deployment to serve any Customer Location within the MDU within nine months of the date when AT&T has reached an agreement with the MDU owner to deploy fiber within the MDU, then AT&T must remove the Customer Location from any subsequent semi-annual compliance report until it completes fiber deployment to serve that Customer Location to the full extent of the rights obtained by AT&T from the MDU owner.

II. FTTP Locations for which Latitude and Longitude Coordinates Are Not Available

AT&T and the FCC staff have agreed that AT&T may report Customer Locations to which AT&T has completed FTTP deployment during a reporting period, but for which latitude and longitude coordinates are not available to include on the semiannual report.

Pursuant to Section VII.I of the Merger Conditions, the Independent Compliance Officer has requested that, for each Customer Location AT&T reports pursuant to Section III.3.B of the Merger Conditions, AT&T provide the Service Address, State, Zip Code, and the Service Address Identification Number,³ as well as latitude and longitude coordinates, if they are

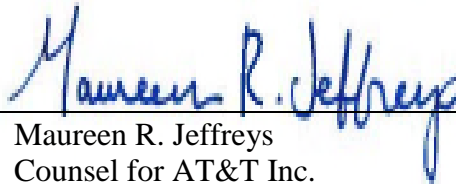
³ The Service Address Identification Number is a unique identification number assigned to each Customer Location in AT&T's databases and systems in the ordinary course of business.

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available as of the end of that reporting period based on the data available in AT&T's ordinary course databases at that time. For those Customer Locations where latitude and longitude coordinates are not available in one reporting period, AT&T will provide those coordinates in a subsequent reporting period compliance report when those coordinates become available in AT&T's ordinary course databases.

Respectfully submitted,



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